

VZCZCXRO2450
PP RUEHBC RUEHDE RUEHDIR RUEHKUK RUEHTRO
DE RUEHRO #0989 2391354
ZNY SSSSS ZZH
P 271354Z AUG 09
FM AMEMBASSY ROME
TO RUEHC/SECSTATE WASHDC PRIORITY 2582
INFO RUCNIRA/IRAN COLLECTIVE PRIORITY
RUEHFL/AMCONSUL FLORENCE PRIORITY 3764
RUEHMIL/AMCONSUL MILAN PRIORITY 0196
RUEHNP/AMCONSUL NAPLES PRIORITY 3973

S E C R E T ROME 000989

SIPDIS

STATE FOR ISN/MTR JOHN PAUL HERRMAN
STATE FOR EUR/PRA

E.O. 12958: DECL: 08/20/2034
TAGS: [ETTC](#) [IR](#) [IT](#) [JA](#) [KS](#) [SCA](#) [MNUC](#) [MTCRE](#) [PARM](#) [PREL](#)
SUBJECT: ITALIAN SURVEILLANCE SHOWS NO EVIDENCE OF EXPORTS
TO IRAN OF JAPANESE-ORIGIN ITEMS

REF: A. STATE 75985
[B](#). ROME 472
[C](#). STATE 34798

Classified By: Economic Counselor William R. Meara
for reasons 1.4 (b) and (d).

[1](#)1. (S) Summary: In response to Post's inquiry about the GOI's investigation of the suspected export of restricted Japanese-origin items by an Italian firm to Iran, the GOI advised that it had put the suspected Italian firm under surveillance for the 3 months ending on July 28. The surveillance uncovered no/no evidence of attempts to export prohibited items. GOI officials indicated that if the USG wished the GOI to extend its surveillance of the company, the USG should so request it formally through the Italian MFA. They also requested more detailed information on the items of concern. End Summary.

[1](#)2. (S) Per Ref A, Post requested that Italian officials provide an up-date on the case of attempts by Iran's Farazeh Equipment Distributor (FEDCO) to acquire Japanese-origin servo actuators from Italian firm Alpi Aviation through an intermediary, the Iranian-based Samnov Company. Post had already demarched the GOI on this case back in April (Ref B). On August 5, Ministry of Economic Development export license official Giovanni Zampa told us that after our April demarche, the Ministry of Foreign Affairs's (MFA) export controls office asked Italian Customs to place Alpi Aviation exports under surveillance. Italian Customs complied to this request, but due to internal procedures could only put Alpi Aviation exports under surveillance for a period of three months from about April 20 to July 28. Zampa said that during this period of surveillance Italian Customs had not seen evidence of suspicious exports, or the servo actuators of concern, by Alpi Aviation to Iran. Zampa added that now that the three months surveillance period has ended, and that there was no evidence of exports of the servo actuators by Alpi Aviation to Iran, that Italian Customs is asking the MFA for guidance on what to do next. Zampa advised that if we believe the risk remains that Alpi Aviation may export the servo actuators to Iran, then we should ask the MFA for an additional period of surveillance by Italian Customs.

[1](#)3. (S) Zampa also requested more specific information on the servo actuator products because, in his opinion, the model names alone that we had earlier provided were not enough for Italian Customs to undertake thorough controls. Besides the model names of the products, Zampa recommended that we provide their pertinent harmonized trade system numbers, whether they are designated as arms or dual use products, and whether they are specifically prohibited by international export control arrangements.

14. (S) On August 17 we met with the MFA's export control official Pierfrancesco De Cerchio to discuss Zampa's up-date, and to inquire on the possibility of continued surveillance by Italian Customs over Alpi Aviation exports to Iran. De Cerchio said he was familiar with the case but was not up to date on its details. He promised to investigate. We told him that based on our previous concerns over the possibility of Alpi Aviation export to Iran of the servo actuators, that continued surveillance by Italian Customs would be appropriate. De Cerchio asked, however, that we confirm with Washington if another period of surveillance is necessary and to come back with a formal request. He said this would be helpful in case Alpi Aviation learns of the Italian Customs surveillance and challenges it in Italian courts.

15. (S) Guidance Request: Post requests Department provide us with more specific information on the servo actuators products of concern, and instructions on whether we should formally ask the MFA for continued surveillance by Italian Customs of Alpi Aviation exports to Iran.
DIBBLE